



PSB Docket No. 7670
Conservation Law Foundation's 10-20-10 CRVP 26(h) Memorandum
Petitioners' 10-22-10 Supplemental Responses

Question 3

Q3: Produce all documents, including any and all studies, analysis, evaluation or data, regarding the environmental impacts in Vermont of the proposed power supply.

A.Deehan.Cole.3: Objection to the extent the request calls for a legal conclusion. Without waiving the objection, none.

CLF 26(h) Request: Based on the proceeding in docket #5330, the environmental impacts in Vermont of the proposed power supply are important and will be addressed in this proceeding. Asking for documents and studies is not requesting a legal conclusion. This information should be provided. If there is none, you should say so.

A.Deehan.Cole.3 Supplemental Response: Petitioners do not have any documents regarding the environmental impacts in Vermont of the proposed power supply. Furthermore, the response did indicate Petitioners have no such documents by responding "none."

Question 5

Q5: Produce all documents regarding Hydro Quebec Production's (HQP) power supply mix as anticipated for each year of the twenty year PPA. Without limiting this request, identify and produce all documents regarding:

a. Power resources for each of the twenty year PPA period identified by generation source and output.

A.Deehan.Cole.5: Objection, the request is overly broad and unduly burdensome. Without waiving the objection, see Response CLF 1Deehan.Cole-12c.

CLF 26(h) Request: General information about HQ's strategic plans is non-responsive. What information do you have about the power supply mix in each year.

A.Deehan.Cole.5 Supplemental Response: Objection, the request is overly broad and unduly burdensome. Further objection that the request is not reasonably calculated to lead to the discovery of admissible evidence. Without waiving the objection, see Response CLF 1Deehan.Cole-12c and Attachment CLF1Deehan.Cole-19 (Hydro Québec Presentation at

Q.3. Produce all documents, including any and all studies, analysis, evaluation or data, regarding the environmental impacts in Vermont of the proposed power supply.

A.Deehan.Cole.3.

Objection to the extent the request calls for a legal conclusion. Without waiving the objection, none.

Person Responsible for Response: William Deehan, James Cater, Charles Watts
Administrative Unit: Vice President, Power Planning & Regulatory Analysis, Central Vermont Public Service Corporation; Director of Power Supply & Strategic Analysis, Central Vermont Public Service Corporation; Manager Strategic Analysis, Central Vermont Public Service Corporation
Date: October 8, 2010

A.CVPS.3.

Objection to the extent the request calls for a legal conclusion. Without waiving the objection, see Exh. Pet.-CVPS- 6.

Person Responsible for Response: William Deehan, James Cater, Charles Watts
Administrative Unit: Vice President, Power Planning & Regulatory Analysis, Central Vermont Public Service Corporation; Director of Power Supply & Strategic Analysis, Central Vermont Public Service Corporation; Manager Strategic Analysis, Central Vermont Public Service Corporation
Date: October 8, 2010

A.GMP.3.

None.

Person Responsible for Response: Douglas C. Smith
Administrative Unit: Manager, Energy Resource Planning & Rates, Green Mountain Power Corporation
Date: October 8, 2010

A.WEC.3.

WEC did not analyze renewable resources of a varied power supply mix, and therefore, there are no documents.

Person Responsible for Response: Patricia Richards
Administrative Unit: Senior Consultant, La Capra Associates
Date: October 8, 2010

A.VEC.3.

None.

Person Responsible for Response: Craig Kieny
Administrative Unit: Senior Power Resources Planner, Vermont Electric Cooperative, Inc.
Date: October 8, 2010

A.VPPSA.3.

VPPSA does not have any documents responsive to this question.

Person Responsible for Response: Brian Callnan
Administrative Unit: Director of Power Supply and Transmission, Vermont Public Power
Supply Authority
Date: October 8, 2010

A.Stowe.3.

See Response CLF 1.Stowe-1.

Person Responsible for Response: Craig Kieny
Administrative Unit: Senior Power Resources Planner, Vermont Electric Cooperative, Inc.
Date: October 8, 2010

A.VMPD.3

VMPD does not have in its possession, custody, or control documents, including any studies, analysis, evaluation or data, regarding the environmental impacts in Vermont of the proposed power supply. To the best of the knowledge of VMPD, there are no such impacts.

Person Responsible for Response: Todd Allard
Administrative Unit: Strategic Sourcing Manager - Energy and Engineering, Omya Inc.
Date: October 8, 2010

A.BED.3

BED has no such documents.

Person Responsible for Response: Ken Nolan,
Administrative Unit: Director of Resource Planning
Date: October 8, 2010